

ORIGINAL

UNITED STATES DISTRICT COURT

for the
District of South Carolina

United States of America)

v.)

Amanda Campbell)

Case No. 2:20-mj-108)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 10/28/2020 and 10/31/2020 in the county of Charleston in the

District of South Carolina, the defendant(s) violated:*Code Section*Title 18, United States Code,
Section 1708*Offense Description*

The defendant did commit Mail Theft.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☐ Continued on the attached sheet.
*Complainant's signature*Ralph Key, US Postal Inspector
Printed name and title

Sworn to before me and signed in my presence.

Date: 11/12/2020
*Judge's signature*City and state: Charleston, South CarolinaHonorable Molly H. Cherry, US Magistrate Judge
Printed name and title

ORIGINAL

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Ralph A Key, being duly sworn, depose and state:

I. INTRODUCTION AND SUMMARY OF PROBABLE CAUSE

1. I submit this affidavit in support of a criminal complaint charging AMANDA M. CAMPBELL, with violating Title 18, United States Code ("U.S.C."), Section 1708. As set forth in greater detail below, based on an investigation conducted by the United States Postal Inspection Service ("USPIS"), there is probable cause to believe that on or about October 28, 2020, Campbell entered the lobbies of two post offices located in or around Charleston, South Carolina, broke into PO Boxes, and stole pieces of U.S. mail. Specifically, Campbell stole mail from post offices located at the following addresses:

- a. St. Andrews Post Office
78 Sycamore Ave
Charleston, SC 29407
- b. James Island Post Office
579 Folly Rd
Charleston, SC 29412

And that on or about October 31, 2020, Campbell again entered the PO Box lobby of the Saint Andrews Post Office, broke into multiple PO Boxes, and stole pieces of US mail.

II. AGENT BACKGROUND

2. I am employed as a U.S. Postal Inspector, and have been so employed since April 2002. I have participated in many investigations involving violations of the laws of the United States. I am currently assigned to the Atlanta Division of the US

Postal Inspection Service Charleston, SC Domicile. As a part of my duties, I am responsible for investigating miscellaneous postal crimes to include crimes associated with mail theft and identity theft. I have received law enforcement training at the US Postal Inspection Service Academy, and specialized training in the areas of mail theft, identity theft, and mail fraud.

3. This affidavit is based on my personal investigative knowledge, on information provided to me by postal service managers with direct knowledge of the underlying facts involved in this investigation, and on a review of video surveillance footage obtained from the impacted offices. I believe the information received from others to be truthful, reliable, and accurate. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me about this investigation; rather, I have set forth only the facts that I believe are sufficient to establish the necessary foundation of the complaint.

III. FACTS ESTABLISHING PROBABLE CAUSE

4. In or about October 2020, the USPIS began investigating incidents of mail theft from PO Boxes at various postal locations in the Charleston area.

5. On or about October 27, 2020, I received a call from Detective James Jackson with the Charleston City Police Department. Detective Jackson advised that he was investigating a mail theft incident at the Comfort Inn & Suites located at 2080 Savannah Highway in Charleston, South Carolina. According to Detective Jackson, hotel management reported that an individual identified as Amanda Campbell was occupying

room 417 as a guest at the hotel. Management advised that Campbell's stay was terminated because her method of payment was declined due to fraud. Upon entering the room, housekeeping staff found a substantial amount of U.S. mail in the room, as seen in the below picture:



6. After examining the pieces of US mail found in Campbell's room, USPIS determined the mail was stolen from PO Boxes in the Charleston area. In addition to the US mail, USPIS found broken PO Box lock components and an impact device, namely a railroad spike. USPIS also found what appear to be counterfeit checks made payable to Campbell using victim account information. See the below Exhibits.

[illegible]

7. Investigators with the City of Charleston Police Department examined video surveillance footage from the Comfort Inn & Suites and observed the following: Campbell driving a Chevrolet Silverado bearing South Carolina tag SHS855. After

parking the aforementioned vehicle, Campbell enters the hotel. Hotel staff confirmed to investigators that Campbell was the occupant of room 417 at that particular time.

8. Both South Carolina tag SHS855 and the Chevrolet Silverado are registered to Amanda Campbell at an address located in the Charleston area.

9. During the course of the investigation, Postal Service Technicians installed video surveillance cameras inside the lobby of impacted postal facilities along with a camera in the parking lot of the James Island Post Office.

10. On October 29, 2020, following a mail theft incident at the James Island Post Office, USPIS reviewed video footage from the PO Box lobby video surveillance system and the external camera covering the parking lot. On the evening of October 28, 2020, at approximately 11:08pm, a vehicle bearing South Carolina tag SHS855 can be seen entering the parking lot of the James Island Post Office. At approximately 11:09 pm, a woman, identified as Campbell, enters the PO Box lobby. She remains in the lobby for several minutes before leaving with multiple parcels/mail in hand. At approximately 11:27 pm, the exterior camera captures a grainy image of a South Carolina vehicle tag that appeared to be SHS855. See the below Exhibit.



11. That same evening, USPIS reviewed video surveillance footage at the Saint Andrews Post Office due to another PO Box attack on the evening of October 28, 2020. According to video surveillance footage, at approximately 9:30 pm on October 28, 2020, a woman, later identified as Amanda Campbell, can be seen entering the PO Box lobby of the Saint Andrews Post Office during which time she checks the doors on

multiple boxes before leaving the post office with a volume of mail in hand. See the below Exhibits.



12. On November 2, 2020, USPS received a report of an additional mail theft incident at the Saint Andrews Post Office. Investigators reviewed footage of the PO Box lobby from October 31, 2020, and observed Campbell enter the lobby around 8:00 pm. Campbell checked a number of PO Box before prying open several boxes using an unknown object. See the below Exhibit.



13. According to United States Postal Service records, Amanda Campbell is not a registered box holder at either location.

14. In summary, based upon the above facts and information, I submit that there is probable cause to believe that on three occasions, two incidents occurring on October 28, 2020, and one incident occurring on October 31, 2020, Amanda Campbell has violated 18 U.S.C. § 1708, by unlawfully removing US mail from authorized depositories. Accordingly, I respectfully request that a criminal complaint be issued.

15. This affidavit has been reviewed by Assistant United States Attorneys
Whit Sowards and Matt Austin.



Ralph A Key
United States Postal Inspector
U. S. Postal Inspection Service

Subscribed and sworn to me on this 12th day of November, 2020.



Honorable Molly H. Cherry
United States Magistrate Judge